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July. 17, 2025

VIA ECF

Honorable Michael A. Shipp
United States District Court
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street, Courtroom 5W
Trenton, New Jersey. 08608

Re: United States v. Reyad Salahaldeen
Docket No.: 0312 3:20CR-00839 (MAS)

Dear Judge Shipp:

My firm represents Reyad Salahaldeen in the above matter. I am writing to request an extension of time to file a response to the draft presentence report and to adjourn the sentencing date.

My associate and I were on vacation when the draft report was filed. Our response is due on Monday, July 21, 2025.

We have been playing catch up after being away, however, I believe that we will have substantial objections. We also must meet with our client, who is detained, to review the report and get his comments.

Mr. Salahaldeen's sentencing date is currently scheduled for September 11, 2025, and under the present schedule, Probation Officer Allison Slater's final report would be due on August 2, 2025.

Accordingly, I respectfully request that our response to the draft presentence report be extended to August 8, 2025, and the sentencing date be adjourned.

Thank you for consideration.

Respectfully submitted,

/s/ Alan L. Zegas

Alan L. Zegas

cc: Rebecca Yuan, AUSA. (Via ECF)
Gary Winters, AUSA (Via ECF)
Allison Slater, United States Probation Officer (Via Email)